



Paul Rice  
Fair Trade USA  
1900 Harrison St. Suite 1700  
Oakland, CA 94612

Dear Mr. Rice,

We are writing to you concerning Fair Trade USA's (FTUSA) solicitation of feedback for your Agricultural Production Standard Dairy Draft Amendment. We refuse to engage in an exercise that doesn't reflect the needs and values of workers, and we urge Fair Trade USA to dissolve its performative comment process and halt its pilot in the dairy industry. It's clear from [Fair Trade USA's work in other industries](#) that this solicitation of input is a sham process that seeks to protect corporations without genuinely incorporating feedback from impacted communities.

Fair Trade USA has [demonstrated your inability](#) to protect workers' rights on certified farms and plantations. The lack of worker-driven mechanisms for monitoring and enforcement make it impossible for the program to make real change on the ground. FTUSA has a [history](#) of creating programs that actively undermine organizing by farmworker communities, and your entry into the dairy industry has already been [actively opposed by the workers](#) it is supposed to benefit.

The FTUSA program appears designed with no intention that the standards actually be met, with no way for its designated monitors to determine what actual working conditions are. Such a program could not truthfully certify dairy farms' compliance with any standards, because their enforcement systems lack ways for workers to understand their rights, report violations of those rights, be protected from retaliation for attempting to enforce standards, or participate in any meaningful way in monitoring their employers' compliance. The program fails to address major structural issues in the dairy industry, including the economic pressures squeezing small-scale dairy farm owners and farmworkers, and environmental challenges.

We demand that FTUSA stop this insincere "public consultation" and end your harmful proposed expansion into the dairy industry.

Sincerely,

Anuradha Mittal - Chair, Board of Directors, Ben & Jerrys  
Alianza Agricola  
Center for Constitutional Rights  
Coalition of Immokalee Workers  
Comité de Apoyo a Los Trabajadores Agrícolas (CATA)  
Cornucopia Institute  
Corporate Accountability Lab  
Fair Food Standards Council  
Fair World Project  
Family Farm Defenders  
Farm Forward  
Federation du Commerce - Quebec, Canada  
Farmworker Association of Florida

Food Chain Worker Alliance  
 Garment Worker Center  
 Global Labor Justice - International Labor Rights Forum  
 Harrisburg Urban Growers  
 HEAL Food Alliance  
 Institute for Agriculture and Trade Policy  
 Justice in Motion  
 Migrant Justice  
 National Center for Law and Economic Justice  
 National Family Farm Coalition  
 Northeast Organic Farming Association - Vermont (NOFAVT)  
 Northeast Organic Farming Association - Interstate Council (NOFA-IC)  
 Northeast Organic Farming Association - NH Chapter  
 Northeast Sustainable Agriculture Working Group (NESAWG)  
 Partners for Dignity & Rights  
 Real Food Generation  
 Stonewall Farm, Keene NH  
 Street Vendors Association of Chicago  
 T'ruah: The Rabbinic Call for Human Rights  
 University Network for Human Rights  
 Worker-driven Social Responsibility Network  
 Workers Center of Central New York





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 **T'ruah**  
the rabbinic call for human rights



UNIVERSITY  
NETWORK  
FOR HUMAN  
RIGHTS

WSR **WORKER-DRIVEN  
SOCIAL RESPONSIBILITY  
NETWORK**



**real food  
generation**